



QUARTERLY REPORT

FOR THE PERIOD ENDING JUNE 30, 2021

July 30, 2021

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1. Introduction

The Relocation Payment Clearinghouse LLC (“RPC”) oversees and administers the cost-related aspects of the C-band (3.7 to 4.2 GHz) transition. Among its duties, the RPC collects and distributes payments for the C-band transition, administers the reimbursement fund, reviews reimbursement claims for relocation costs, mitigates financial disputes among stakeholders, and administers the dispute resolution process.

The RPC provides its Quarterly Progress Report to the Federal Communications Commission (“FCC”) regarding the progress of the cost-related aspects of the C-band transition. This report summarizes the RPC’s activities undertaken from April 1, 2021 through June 30, 2021. Pursuant to the FCC’s Report and Order and Order of Proposed Modification, the RPC is required to file progress reports on a quarterly basis to facilitate the FCC’s oversight of the transition.¹

2. Summary of the RPC’s Activities

During this reporting period, the primary focus of the RPC has been to refine policies and procedures and establish systems to aid in the successful execution of the RPC’s duties and responsibilities as prescribed in the *Report and Order*.

Highlights for the April 1, 2021 to June 30, 2021 reporting period include that the RPC has:

- Published draft C-band Handbook for feedback and comments from stakeholders.
- Incorporated stakeholder feedback and comments into the draft C-band Handbook.
- Launched the RPC’s Coupa Supplier Portal (“Coupa Portal”), the RPC’s system for submitting and processing claims associated with the C-band relocation program.
- Initiated outreach to Space Station Operators (“SSOs”) and lump sum filers to begin the profile setup in the Coupa Portal.
- Began reviewing information and documentation submitted by potential claimants in the Coupa Portal to determine eligibility.
- Began preparing purchase orders to facilitate the claims submission process.

The RPC performed the following additional activities during the April 1, 2021 to June 30, 2021 reporting period.

Project Management and Communications

- Prepared Project Management Office Dashboard reports to monitor the status of open tasks, decisions, and deliverables.
- Participated in industry work sessions and panels to stay abreast of industry concerns.
- Established the Relocation Payment Clearinghouse Service Desk call center (301-463-4676).
- Performed outreach to lump sum election filers to confirm or update contact information to initiate the Coupa Portal account setup.
- Performed outreach to assist claimants with submitting their claimant profile in the Coupa Portal.
- Prepared Claimant Setup Dashboard report.

¹ *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Report and Order and Order of Proposed Modification, 35 FCC Rcd 2343, 2450, para. 270 (2020) (“*Report and Order*”); see also 47 C.F.R. § 27.1414(c)(1).

- Prepared and published training materials to guide claimants through the Coupa Portal account setup and claimant profile submission processes.

Claims Reimbursement

- Refined workflows, policies, and procedures to govern the execution of the RPC's responsibilities related to the claims reimbursement process.
- Established reporting requirements, built system reports, and created internal trackers to manage the claimant setup process.
- Participated in working sessions with stakeholders to discuss the development of policies and procedures related to the claims reimbursement process.
- Participated in monthly meetings with the C-band Technical Working Group-2 and ACA Connects to discuss the RPC's planning activities and progress and to respond to inquiries from industry members.
- Gathered data from all the Lump Sum Election filings submitted to the FCC. Analyzed and validated this data using publicly available external sources.
- Began review of information and documentation submitted by potential claimants via Coupa to establish a Coupa profile (see Section 3. Claimant Setup Status below for details).
- Incorporated stakeholder input into the preliminary draft of the RPC's C-band Handbook, which will be an informational guide for C-band stakeholders and interested parties.

Financial Management

- Prepared preliminary operating policies and procedures to govern the execution of the RPC's responsibilities related to the management of program funds.
- Designed and implemented funds management safeguards and controls.
- Finalized *pro rata* share calculations.
- Developed preliminary overlay licensee invoice and billing statement templates.
- Participated in meetings with program stakeholders to discuss expectations and obligations related to the C-band program.

System Implementations

- Developed a project implementation plan for the technology group.
- Prepared and executed software contracts.
- Established process flows for all areas for the Claims Reimbursement and Financial Management Teams to govern the execution of the RPC's responsibilities.
- Designed and tested the accounting system, Microsoft Dynamics 365, to record, manage, and report on program funds collected and distributed.
- Finalized and tested Coupa designs and configurations.
- Initiated integration testing between Coupa and Microsoft Dynamics 365.
- Implemented single sign-on and two-factor authentication for more effective security measures across all environments.
- Opened access to the Coupa Portal to claimants to begin their profile setup.

Risk and Governance

- Refined system security policies.
- Drafted Incident Response, Business Continuity and Disaster Recovery Plans.
- Approved the Quality Assurance/Quality Control Plan and began planning for QA/QC implementation.
- Provided advice and guidance on management's policy decisions related to claimant setup reviews within Coupa.
- Provided advice and guidance on segregation of duties for Coupa and Microsoft Dynamics 365 security groups and roles.
- Drafted process narratives for reporting suspected fraud, waste, and abuse to the RPC.
- Selected third-party fraud reporting hotline provider and configured preliminary web and mobile intake sites to be utilized by stakeholders to anonymously report potential fraud, waste, and abuse, and/or administrative misconduct to the RPC.
- Conducted a preliminary pre-implementation review of the claimant setup functionality in the claims processing system and provided recommendations to RPC management to strengthen internal controls.
- Participated in system implementation and interface development sessions to facilitate RPC management's identification of risks relevant to key systems and consideration of appropriate control mitigation strategies.
- Reviewed key RPC policies, procedures, plans, and other deliverables to confirm that RPC management identified relevant risks and documented appropriate risk acceptance or mitigation responses, including implementation of internal controls.

3. Claimant Setup Status

As of June 30, 2021, the RPC reports that it:

- Confirmed contact information and sent an invitation to 921 potential claimants to begin their profile setup in the Coupa Portal;
- Reviewed and approved 276 claimant profiles;
- Initiated review of 377 additional claimant profiles; and
- Is confirming point of contact information for 544 potential claimants.

4. Financial Information

4.1. Status of Reimbursement Funds Available for Clearing Obligations

Through June 30, 2021, the RPC has not billed or collected any reimbursement funds or started to accept reimbursement claims.

4.2. Overlay Licensee Billings and Collections

Through June 30, 2021, the RPC has not billed or collected any amounts from overlay licensees. The RPC is finalizing templates and policies and procedures governing the overlay licensee billing and collection methods.

4.3. Relocation Payments Issued

Through June 30, 2021, the RPC has not made any payments to reimburse relocation costs.

4.4. Certifications Filed by Incumbents

Through June 30, 2021, the RPC has not received any certifications filed by incumbents.

4.5. Accelerated Relocation Payments Issued

The Phase I and II accelerated relocation deadlines are December 5, 2021 and December 5, 2023, respectively. Through June 30, 2021, the RPC has not made any accelerated relocation payments. The RPC has been developing policies and procedures to define the methods whereby accelerated relocation payments will be requested and reviewed to expedite the review and distribution of such payments.

4.6. RPC Fees and Expenses

The RPC's Fees and Expenses are shown in Table 1. The RPC's fees consist of labor costs that are required for the RPC to carry out its duties. The labor cost categories include:

- Program Management and Communications
- Governance and Compliance
- Claims Reimbursement Activities
- Financial Management and Reporting
- Data Management
- Legal and Regulatory
- Technical Engineers/Subject Matter Experts
- Technical Advisory

Table 1: RPC Fees and Expenses

	Quarter Ending March 31, 2021	Quarter Ending June 30, 2021	Year-to-Date
Fees			
CohnReznick	\$1,830,980.00	\$2,449,515.00	\$4,280,495.00
Squire Patton Boggs	\$1,003,908.00	\$1,418,757.15	\$2,422,665.15
Intellicom Technologies	\$345,015.11	\$446,196.50	\$791,211.61
Reed Strategy	\$44,730.00	\$43,515.00	\$88,245.00
Expenses	\$283,069.71	\$383,446.53	\$666,516.24
Total Fees and Expenses	\$3,507,702.82	\$4,741,430.18	\$8,249,133.00

5. Disputes

Through June 30, 2021, the RPC has not received notice of any disputes as the claims submission process has not been initiated. The RPC is developing policies and procedures governing the dispute resolution process.